

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No CR 14-415

ANTHONY CHEUN, et al.,

Defendant.

UNOPPOSED MOTION TO CONTINUE
REPORTING DATE

COMES NOW defendant, Anthony Cheun, by and through his counsel of record, Erlinda O. Johnson, and hereby respectfully request that the Court continue the defendant's surrender date to the Bureau of Prisons from September 25, 2015 until October 7, 2015. In support of this request, the defendant states as follows:

1. On July 23, 2015 the Court sentenced defendant, Anthony Cheun to a term of imprisonment of 24 months upon his plea of guilty Possession with Intent to Distribute a Mixture and Substance Containing Methamphetamine in violation of 21 U.S.C. 841(b)(1)(C).

2. The defendant's surrender date to begin service of his sentence was upon notification from the United States Marshal's Office.

3. The Judgment and Commitment [Doc. 97] was filed on July 29, 2015.

4. Mr. Cheun did not receive notification of surrender date and designation.

5. On September 23, 2015 Mr. Cheun's counsel was telephonically notified that Mr. Cheun's surrender date is September 25, 2015.

6. Mr. Cheun needs additional time to travel from Florida to Tucson, Arizona.

7. The government has no objection to the requested extension of the defendant's surrender date to October 7, 2015.

WHEREFORE the United States and defendant Anthony Cheun request that the Court continue the defendant's surrender date from September 25, 2015 to October 7, 2015.

Respectfully Submitted,

electronically filed 9/25/15
Erlinda O. Johnson
Attorney for Anthony Cheun
1110 Second Street, NW
Albuquerque, NM 87102
(505) 792-4048

I hereby certify that a true and correct copy of the foregoing pleading was electronically served on all counsel of record upon this 25th day of September, 2015, via the Court's CM/ECF automated filing system.

/s/
Erlinda O. Johnson
Attorney at Law